

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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|-----------------------------------|---|-------------------------------|
| IN RE: |) | Chapter |
| JOSEPH DOLINAR, III |) | Case No.: 18-24648 CMB |
| Debtor(s) |) | |
| COMMUNITY LOAN SERVICING |) | |
| Movant |) | Doc:141 |
| vs |) | |
| JOSEPH DOLINAR, III |) | |
| Respondents |) | |
| And |) | |
| RONDA J. WINNECOUR ESQUIRE |) | |
| CHAPTER 13 TRUSTEE |) | |
| Additional Respondent |) | |
| |) | |

**CERTIFICATION IN RESPONSE TO MOTION FOR RELIEF FROM
STAY FILED BY COMMUNITY LOAN SERVICING, LLC**

Sean Logue, Esquire of full age, hereby certifies and says:

1. I am counsel for the above debtor, Joseph Dolinar, III
2. The debtors Chapter 13 Case was filed on November 30, 2018.
3. Listed in the debtors Chapter 13 schedules and plan is the debtors residential

property located at 102 Stuart Street, Bethel Park, PA 15102 which property is subject to a first mortgage lien held by Community Loan Servicing.

4. On October 8, 2021 Community Loan Servicing filed a Motion for Relief from Stay stating the debtor was behind with his plan payments which payments included his post-petition mortgage payments.

5. The debtors Chapter 13 plan proposed to sale the Debtors rental property to satisfy all debt owed by the debtor including any mortgage arrearages owed to Bayview Loan Servicing, LLC.

6. The property sold and it was the debtors understanding that these payments were made and that the debtor would be notified when to resume regular payments.

7. Counsel spoke with the debtor and explained that after the closing he was to resume regular mortgage payments. He believed that he would receive a bill instructing him as to when and where payments were to be made. He now understands that was a misunderstanding on his part. He would like to be able to modify the plan and place post-petition mortgage arrears in plan and resume regular going forward.

8. For the reasons stated above the debtor, through Counsel would request that the Motion for Relief from Stay filed by Community Loan Servicing, LLC be denied and the debtor be allowed to cure all mortgage arrears through the plan and resume regular mortgage payments.

EXECUTED ON October 25, 2021

By /s/ Sean Logue
Sean Logue & Assoc.
PA#208221
27 W. Main Street
Carnegie, PA 15106
412-389-0805

Fax : 412-253-6520

Email: sean@seanloguelaw.com